Case 1:10-cr-00219-WMS-HKS Document 219 Filed 09/16/13 Page 1 of 25 Exhibit 8

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Enforcement and Compliance Assurance
Office of Criminal Enforcement, Forensics and Training

NEICVP0842E01

ENFORCEMENT CONFIDENTIAL

LABORATORY REPORT

Tonawanda Coke Clean Air Act Investigation

Tonawanda, New York NEIC Project Number: VP0842

June 2009

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Prepared for:

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Case 1:10-cr-00219-WMS-HKS Document 219 Filed 09/16/13 Page 2 of 25 Exhibit 8

ENFORCEMENT CONFIDENTIAL

CONTENTS

LAI	BORATORY ACTIVITIES	3
S	SAMPLE RECEIPT AND DESCRIPTIONS	3
T	ESTING AND RESULTS	3
	Wastewater Analyses	4
	Wastewater Data Quality Summary	
	Hydrocarbon (Tar/Sludge) Analyses	
	Hydrocarbon Data Quality Summary	
	Volatile Organics in Air	
	Volatile Organics in Air Data Quality Summary	12
TAI	BLES	
1	Analytical Procedures and Analysts	4
2	Wastewater Sample Analytical Results	5
3	Hydrocarbon Sample Analytical Results	11
4	Volatile Organics in Air Analytical Results	12
APF	PENDIX	
A	Chain-of-Custody Records (6 pages)	G

The contents page shows all the sections contained in this report and provides a clear indication of the end of this report.

LABORATORY ACTIVITIES

SAMPLE RECEIPT AND DESCRIPTIONS

On April 17 and 21, 2009, the U.S. Environmental Protection Agency (EPA) National Enforcement Investigations Center (NEIC) laboratory received 34 wastewater samples and 3 trip blanks, 3 tar and 3 sludge (total of 6 hydrocarbon) samples, and 12 air canister samples with 2 canister blanks from the Tonawanda Coke Corporation investigation. A copy of the chain-of-custody record is attached as **Appendix A**. The samples were maintained under custody in accordance with the NEIC Evidence Management Procedure, NEICPROC/00-059R2.

TESTING AND RESULTS

Table 1 lists the analysts and the analytical procedures used to detect and measure the target volatile organic compounds of benzene, toluene, ethylbenzene, xylenes (BTEX) and naphthalene. Styrene and dichlorodifluoromethane were also identified in some of the air canister samples.

NEIC personnel conducted all analyses in accordance with the NEIC quality system during April and May 2009. Data quality summaries for all laboratory measurements are maintained in the project file. Sample description and date information listed in tables 2, 3, and 4 are from the chain-of-custody records, and the quantitation limits were calculated from the lowest calibration standard and sample volume used for each analysis.

Table 1

ANALYTICAL PROCEDURES AND ANALYSTS Tonawanda Coke Corporation Tonawanda, New York

Analytical Method/Procedures	Analysts
 Wastewater: EPA SW-846 Method 5030B, Purge-and-Trap for Aqueous Samples EPA SW-846 Method 8260C, Volatile Organic Compounds by Gas Chromatography/Mass Spectrometry (GC/MS) Volatile Organic Analysis by Gas Chromatography/Mass Spectrometry, NEICPROC/00-002R3 	Tam Talarski
 Hydrocarbons (Tar/Sludge): EPA SW-846 Method 3585, Waste Dilution for Organic Compounds EPA SW-846 Method 5030B, Purge-and-Trap for Aqueous Samples EPA SW-846 Method 8260C, Volatile Organic Compounds by Gas Chromatography/Mass Spectrometry (GC/MS) Volatile Organic Analysis by Gas Chromatography/Mass Spectrometry, NEICPROC/00-002R3 	Jing-Fen Chen
 Air Canister Samples: Gas Phase Testing for Organic Contaminants, NEICPROC/00-0011R4 EPA Compendium Method TO-15, Determination of Volatile Organic Compounds in Air Collected in Specially-Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry 	Bob Bohn

Wastewater Analyses

The samples and trip blanks were analyzed for BTEX and naphthalene. Five milliliters of each sample, or an aliquot from each sample diluted in deionized water, were analyzed for BTEX and naphthalene by purge-and-trap gas chromatography/mass spectrometry (GC/MS). Table 2 contains the analytical results for the wastewater samples.

Wastewater Data Quality Summary

BTEX and naphthalene were not identified in the laboratory deionized water blanks or the trip blanks at levels exceeding the quantitation limits.

The analytical measurement uncertainty estimate for the reported results was based on an evaluation of all quality control (QC) data. There was no indication of analytical measurement bias, and an estimate of the random error associated with the data was calculated from quality control specifications (75 to 125 percent of the known value for QC samples). Using a uniform distribution model, the relative standard uncertainty associated with the results was 14.4 percent.

Case 1:10-cr-00219-WMS-HKS Document 219 Filed 09/16/13 Page 5 of 25 Exhibit 8

ENFORCEMENT CONFIDENTIAL

Table 2

NEIC Station Number				
1,444,15	Sample Description			
NEIC Tag			Concentration	Quantitation Limit
Number	Date Collected	Compound	(mg/L)'	(mg/L)
		Benzene	3.50	
Station 01	Ammonia stripper inlet	Ethylbenzene	< QL	
NE 05212	11	Naphthalene	13.8	
NE-25313 NE-25314	4/15/2009	Toluene	0.757	
NE-23314		<i>m-</i> &/or p-Xylene o-Xylene	0.120 0.0447	
		Benzene	3.69	
		Ethylbenzene	< QL	· ·
Station 01 ²	Ammonia stripper inlet	Naphthalene	18.6	
NIC OCCO	1/16/2000	Toluene	0.659	i
NE-25334	4/16/2009	m- &/or p-Xylene	0.112	0.10
		o-Xylene	< QL	0.10
		Benzene	3.97	0.071
Station 01 ²	Ammonia stripper inlet	Ethylbenzene	< QL	0.071
Button 61	7 minoma surpper mice	Naphthalene	22.6	(mg/L) 0.20 0.033 0.20 0.033 0.033 0.10 0.10 0.10 0.10 0.10 0
NE-25335	4/16/2009	Toluene	0.647	1
		m- &/or p-Xylene	0.106	
		o-Xylene	< QL	
		Benzene Ethylbenzene	3.85	•
Station 01 ²	Ammonia stripper inlet	Naphthalene	< QL 21.6	
		Toluene	0.656	
NE-25336	4/16/2009	m- &/or p-Xylene	0.109	
		o-Xylene	< QL	
		Benzene	4.23	
Station 01	A	Ethylbenzene	< QL	
	Ammonia stripper inlet	Naphthalene	10.4	
NE-25427	4/20/2009	Toluene	0.570	0.10
NE-25428	4/20/2009	<i>m-</i> &/or p-Xylene	0.0830	
		o-Xylene	< QL	
G 22		Benzene	33.9	
Station 02	Coke oven drip leg to	Ethylbenzene	< QL	
NIC 25216	boiler	Naphthalene	438	
NE-25316 NE-25317	4/15/2009	Toluene m- &/or p-Xylene	4.60 0.761	
1115-2331/	4/13/2009	o-Xylene	0.761	
		Benzene	20.8	
Station 02	Coke oven drip leg to	Ethylbenzene	20.8 < QL	
	boiler	Naphthalene	278	
NE-25342	~ ~ ~ ~	Toluene	3.12	
NE-25343	4/16/2009	m- &/or p-Xylene	0.450	
*		o-Xylene	< QL	

Case 1:10-cr-00219-WMS-HKS Document 219 Filed 09/16/13 Page 6 of 25 Exhibit 8

ENFORCEMENT CONFIDENTIAL

Table 2

NEIC Station Number				
	Sample Description			
NEIC Tag	Data Callantad	C	Concentration	1 -
Number	Date Collected	Compound	(mg/L) '	
	Cake area duin lag to	Benzene	19.5	f .
Station 02 ²	Coke oven drip leg to boilerhouse	Ethylbenzene Naphthalene	< QL 142	
	oonemouse	Toluene	3.31	l .
NE-25408	4/20/2009	<i>m-</i> &/or p-Xylene	0.477	
	11 20 7 20 0 9	o-Xylene	< QL	
		Benzene	22.1	
Station 02 ²	Coke oven drip leg to	Ethylbenzene	< QL	0.50
Station 02	boilerhouse	Naphthalene	106	5.0
NE-25409		Toluene	3.52	0.50
1412-2540)	4/20/2009	<i>m- &/or p-</i> Xylene	0.501	0.50
		o-Xylene	< QL	
		Benzene	23.6	1
Station 02 ²	Coke oven drip leg to	Ethylbenzene	< QL	
	boilerhouse	Naphthalene	134	I I
NE-25410	4/20/2000	Toluene	3.85 0.509	1
	4/20/2009	<i>m-</i> &/or p-Xylene o-Xylene	0.309 < QL	
		Benzene	6.43	
Station 03		Ethylbenzene	< QL	i i
	Surge tank effluent	Naphthalene	57.8	
NE-25319	4/17/2000	Toluene	1.12	1
NE-25320	4/15/2009	<i>m-</i> &/or p-Xylene	0.219	0.063
		o-Xylene	0.0762	0.063
		Benzene	5.09	0.10
Station 03	Surge tank effluent	Ethylbenzene	< QL	0.10
	Suige tunk ermaent	Naphthalene	30.9	1.2
NE-25345	4/16/2009	Toluene	0.891	1
NE-25346		<i>m- &/or p-</i> Xylene	0.165	
		o-Xylene	< QL	
Station 03		Benzene Ethylbenzene	8.27	
Station 05	Surge tank effluent	Naphthalene	< QL 25.0	
NE-25398		Toluene	1.54	
NE-25399	4/20/2009	<i>m</i> - &/or p-Xylene	0.268	
		o-Xylene	< QL	
		Benzene	0.581	
Station 04	BH moat	Ethylbenzene	< QL	5.0 0.50 0.50 0.50 0.33 0.33 2.0 0.33 0.33 0.33 0.50 0.063 1.0 0.063 0.063 0.063 0.063 0.10 0.10
	BH moat	Naphthalene	4.56	
NE-25322	4/15/2009	Toluene	0.154	
NE 25323	71 1312007	<i>m- &/or p-</i> Xylene	0.0451	1
L		o-Xylene	< QL	0.025

Table 2

NEIC Station Number				
Tramoer	Sample Description			
NEIC Tag			Concentration	Quantitation Limit
Number	Date Collected	Compound	(mg/L)'	(mg/L)
		Benzene	0.431	0.025
Station 04	BH moat	Ethylbenzene	< QL	0.010
NIT 05240		Naphthalene	3.34	0.20
NE-25348 NE-25349	4/16/2009	Toluene	0.0852	0.025
1015-25549		<i>m- &/or p-</i> Xylene <i>o-</i> Xylene	0.0178 < QL	0.010 0.010
		Benzene	0.458	0.010
Station 04		Ethylbenzene	< QL	0.013
	BH moat	Naphthalene	3.11	0.10
NE-25404	4/20/2000	Toluene	0.100	0.013
NE-25405	4/20/2009	<i>m- &/or p-</i> Xylene	0.0268	0.013
		o-Xylene	< QL	0.013
-		Benzene	27.2	1.0
Station 05	Drip leg downstream of	Ethylbenzene	< QL	0.12
NIE 25225	tar precip.	Naphthalene	49.2	1.0
NE-25325 NE-25326	4/15/2000	Toluene	4.80	0.12
NE-23320	4/15/2009	<i>m- &/or p-</i> Xylene <i>o-</i> Xylene	0.986 0.313	0.12 0.12
		Benzene	30.9	0.12
Station 05	Drip leg downstream of	Ethylbenzene	< QL	0.10
	tar precip.	Naphthalene	23.0	0.67
NE 25351		Toluene	4.80	0.67
NE 25352	4/16/2009	<i>m- &/or p-</i> Xylene	0.969	0.10
		o-Xylene	0.300	0.10
		Benzene	27.9	0.50
Station 05	Drip leg downstream of	Ethylbenzene	< QL	0.12
	tar precip.	Naphthalene	39.0	0.50
NE-25415	4/20/2000	Toluene	5.06	0.50
	4/20/2009	m- &/or p-Xylene	0.934	0.12
		o-Xylene Benzene	0.317 < QL	0.12
	Ammonia stripper	Ethylbenzene	< QL	0.0017
Station 08	effluent	Naphthalene	0.00271	0.0017
NIT OFFICE	**********	Toluene	< QL	0.0017
NE-25337	4/16/2009	<i>m- &/or p-</i> Xylene	< QL	0.0017
		o-Xylene	< QL	0.0017
		Benzene	3.61	0.50
Station 09	Tar decanter liquor	Ethylbenzene	< QL	0.042
347.05057	Tai accuming inques	Naphthalene	10.3	0.50
NE-25354	4/16/2009	Toluene	0.610	0.042
NE-25355		<i>m-</i> &/or p-Xylene	0.0732	0.042
[o-Xylene	< QL	0.042

Case 1:10-cr-00219-WMS-HKS Document 219 Filed 09/16/13 Page 8 of 25 Exhibit 8

ENFORCEMENT CONFIDENTIAL

Table 2

NEIC Station Number					
	Sample Description				
NEIC Tag	D . C		Concentration	Quantitation Limit	
Number	Date Collected	Compound	(mg/L) '		
C+-+! 00		Benzene	4.96	*	
Station 09	Tar decanter liquor	Ethylbenzene	< QL		
NE-25412	•	Naphthalene Toluene	21.6	Quantitation Limit (mg/L) 0.25 0.063 0.25 0.063 0.063 0.063 0.10 0.10 0.10 0.10 0.10 0.10 0.10 0.1	
NE-25412 NE-25413	4/20/2009	m- &/or p-Xylene	0.771 0.103	I .	
1115-25415		o-Xylene	0.103 < QL	1	
		Benzene	5.92		
Station 10	Ammonia removal system	Ethylbenzene	< QL	£	
	sump	Naphthalene	27.6		
NE-25357	1	Toluene	0.934	1	
NE-25358	4/16/2009	<i>m- &/or p-</i> Xylene	0.161		
		o-Xylene	< QL	0.10	
		Benzene	2.46	0.10	
Station 10	Ammonia removal system	Ethylbenzene	< QL		
	sump	Naphthalene	447	I .	
NE-25425	1/20/2000	Toluene	0.340		
	4/20/2009	<i>m-</i> &/or p-Xylene	< QL		
		o-Xylene Benzene	< QL 6.52		
Station 11		Ethylbenzene	6.32 < QL		
Station 11	Downcomer sump	Naphthalene	19.4		
NE-25360		Toluene	1.22		
NE-25361	4/16/2009	<i>m- &/or p-</i> Xylene	0.268		
		o-Xylene	0.0998		
		Benzene	11.8	0.12	
Station 113	Downcomer sump	Ethylbenzene	< QL	0.12	
	Downcomer sump	Naphthalene	36.0		
NE-25419	4/20/2009	Toluene	2.51		
NE-25420	172072000	<i>m- &/or p-</i> Xylene	0.639		
		o-Xylene	0.216		
		Benzene	1.51		
Station 12 ²	Tar precip. sump	Ethylbenzene Naphthalene	< QL 17.8		
		Toluene	0.380		
NE-25363	4/16/2009	m- &/or p-Xylene	0.0633		
		o-Xylene	< QL		
		Benzene	1.86		
Station 102	Transport	Ethylbenzene	< QL		
Station 12 ²	Tar precip. sump	Naphthalene	20.3		
NE-25364	4/16/2009	Toluene	0.536		
1115-23304	4/10/2009	m- &/or p-Xylene	0.0939	0.071	
		o-Xylene	< QL	0.071	

Case 1:10-cr-00219-WMS-HKS Document 219 Filed 09/16/13 Page 9 of 25 Exhibit 8

ENFORCEMENT CONFIDENTIAL

Table 2

NEIC Station Number				
NIDIO M	Sample Description			
NEIC Tag Number Date Collected		Compound	Concentration (mg/L)'	Quantitation Limit (mg/L)
Transcr	Date Conceted	Benzene	1.79	
		Ethylbenzene	1.79 < QL	0.050 0.050
Station 12 ²	Tar precip, sump	Naphthalene	22.0	1.0
		Toluene	0.524	0.050
NE-25365	4/16/2009	m- &/or p-Xylene	0.0987	0.050
`		o-Xylene	< QL	0.050
		Benzene	0.810	0.050
Station 12	Tar precip, sump	Ethylbenzene	< QL	0.050
	rai precip, sump	Naphthalene	14.9	0.50
NE-25421	4/20/2009	Toluene	0.247	0.050
NE-25422	4/20/2007	<i>m- &/or p-</i> Xylene	0.0549	0.050
		o-Xylene	< QL	0.050
		Benzene	< QL	0.0010
Station 13	Quench water makeup	Ethylbenzene	< QL	0.0010
	,	Naphthalene < QL Toluene < QL	0.0010	
NE-25393	4/20/2009	m- &/or p-Xylene	< QL < QL	0.0010 0.0010
		o-Xylene	< QL	0.0010
		Benzene	< QL "	0.0010
		Ethylbenzene	< QL	0.0010
Station 14	Quench sump	Naphthalene	< QL	0.0010
NE 25206	4/20/2000	Toluene	< QL	0.0010
NE-25396	4/20/2009	m- &/or p-Xylene	< QL	0.0010
		o-Xylene	< QL	0.0010
		Benzene	< QL	0.0010
Station 15	Plate cooler NCCW	Ethylbenzene	< QL	0.0010
	1 1000 000 100 1 1 0 0 0 0 0 0 0 0 0 0	Naphthalene	< QL	0.0010
NE-25402	4/20/2009	Toluene	< QL	0.0010
		m- &/or p-Xylene	< QL	0.0010
		o-Xylene Benzene	< QL 0.00158	0.0010 0.0010
		Ethylbenzene	0.00138 < QL	0.0010
Station 17	Lagoon inlet	Naphthalene	0.00132	0.0010
) NE 07401	1/00/000	Toluene	< QL	0.0010
NE-25431	4/20/2009	<i>m-</i> &/or p-Xylene	< QL	0.0010
		o-Xylene	< QL	0.0010
		Benzene	< QL	0.0010
Trip Blank	Blanks	Ethylbenzene	< QL	0.0010
111p Diank	Digity	Naphthalene	< QL	0.0010
NE-25328	4/15/2009	Toluene	< QL	0.0010
11.5 25520	11 12/2007	m- &/or p-Xylene	< QL	0.0010
		o-Xylene	< QL	0.0010

Case 1:10-cr-00219-WMS-HKS Document 219 Filed 09/16/13 Page 10-of 25

ENFORCEMENT CONFIDENTIAL

Table 2

WASTEWATER SAMPLE ANALYTICAL RESULTS Tonawanda Coke Corporation Tonawanda, New York

NEIC Station				
Number				
	Sample Description			
NEIC Tag			Concentration	Quantitation Limit
Number	Date Collected	Compound	(mg/L)'	(mg/L)
		Benzene	< QL	0.0010
Trip Blank	Blanks	Ethylbenzene	< QL	0.0010
. Trip Diank	Dialiks	Naphthalene	< QL	0.0010
NE-25368	4/16/2009	Toluene	< QL	0.0010
NL-25500		<i>m- &/or p-</i> Xylene	< QL	0.0010
		o-Xylene	< QL	0.0010
		Benzene	< QL	0.0010
Trip Blank	Blanks	Ethylbenzene	< QL	0.0010
TTIP Diank	Dianks	Naphthalene	< QL	0.0010
NE-25432	4/20/2009	Toluene	< QL	0.0010
111.72.7432	4/20/2009	<i>m</i> - &/or p-Xylene	< QL	0.0010
		o-Xylene	< QL	0.0010

 $^{^{-1}}$ \leq QL indicates that the compound was not identified at levels above the indicated quantitation limit.

Hydrocarbon (Tar/Sludge) Analyses

An aliquot from the hydrocarbon samples diluted in methanol was analyzed for BTEX and naphthalene by purge-and-trap GC/MS. Table 3 contains the analytical results for the hydrocarbon samples.

Hydrocarbon Data Quality Summary

Neither BTEX nor naphthalene was identified in the laboratory methanol blanks at levels exceeding the quantitation limit [0.1 milligram per liter (mg/L)].

The analytical measurement uncertainty estimate for the reported results was based on an evaluation of all QC data. There was no indication of analytical measurement bias, and an estimate of the random error associated with the data was calculated from QC specifications (80 to 120 percent of the known value for QC samples). Using a uniform distribution model, the relative standard uncertainty associated with the results was 11.5 percent.

² Field replicate.

³ The reported result for each analyte is the average of three measurements.

Table 3

HYDROCARBON SAMPLE ANALYTICAL RESULTS Tonawanda Coke Corporation Tonawanda, New York

NEIC Station Number				
Number	Sample Description			
NEIC Tag	Sample Bescription			
Number	Date Collected	Compound	Concentration	Quantitation Limit
		Benzene	995 mg/L	250 mg/L
Station 06'	Tar decanter tar	Naphthalene	58,500 mg/L	1,000 mg/L
		Toluene	781 mg/L	250 mg/L
NE-25330	4/15/2009	<i>m- &/or p-</i> Xylene	567 mg/L	250 mg/L
		o-Xylene	< QL	250 mg/L
		Benzene	901 mg/L	250 mg/L
Station 06	Tar decanter tar	Naphthalene	52,700 mg/L	1,000 mg/L
		Toluene	699 mg/L	250 mg/L
NE-25370	4/16/2009	<i>m- &/or p-</i> Xylene	503 mg/L	250 mg/L
		o-Xylene	< QL	250 mg/L
		Benzene	1,010 mg/L	250 mg/L
Station 06	Tar decanter tar	Naphthalene	62,600 mg/L	1,000 mg/L
		Toluene	807 mg/L	250 mg/L
NE-25388	4/20/2009	<i>m- &/or p-</i> Xylene	551 mg/L	250 mg/L
		o-Xylene	< QL	250 mg/L
		Benzene	434 mg/kg	125 mg/kg
Station 07	Tar decanter sludge	Naphthalene	30,000 mg/kg	500 mg/kg
		Toluene	368 mg/kg	125 mg/kg
NE-25332	4/15/2009	<i>m- &/or p-</i> Xylene	281 mg/kg "	125 mg/kg
		o-Xylene	< QL	125 mg/kg
Station 07'		Benzene	388 mg/kg	125 mg/kg
Station 07	Tar decanter sludge	Naphthalene	23,900 mg/kg	500 mg/kg
NE-25372		Toluene	352 mg/kg	125 mg/kg
NE-25373	4/16/2009	<i>m-</i> &/or p-Xylene	254 mg/kg	125 mg/kg
1113 23373		o-Xylene	< QL	125 mg/kg
		Benzene	314 mg/kg	125 mg/kg
Station 07	Tar decanter sludge	Naphthalene	18,900 mg/kg	500 mg/kg
		Toluene	255 mg/kg	125 mg/kg
NE-25390	4/20/2009	<i>m- &/or p-</i> Xylene	182 mg/kg	125 mg/kg
		o-Xylene	< QL	125 mg/kg

¹ The reported result for this sample is the average of three analytical measurements.

Volatile Organics in Air

NEICVP0842E01

Analytical results for TO-15 volatile organic compounds, including naphthalene, are summarized in Table 4. The reported values are from single measurements unless otherwise noted.

Volatile Organics in Air Data Quality Summary

No reported compounds were identified in the laboratory nitrogen blanks at levels exceeding the quantitation limits [1 to 5 parts per billion by volume (ppbv)].

The analytical measurement uncertainty estimate for the reported results was based on an evaluation of all QC data. There was no indication of analytical measurement bias, and an estimate of the random error associated with the data was calculated from quality control specifications (60 to 140 percent of the known value for QC samples). Using a uniform distribution model, the relative standard uncertainty associated with the results was 23.1 percent.

Table 4

VOLATILE ORGANICS IN AIR ANALYTICAL RESULTS

Tonawanda Coke Corporation

Tonawanda, New York

NEIC Station					
Number		Date Collected			
		(time)	,		
NEIC Tag	NEIC Station			Concentration'	Quantitation Limit
Number	Location	Canister Number	Compound	(ppbv²)	(ppbv)
			Benzene	25.5	1.20
			Ethylbenzene	< QL	1.18
01A	Ammonia	4/16/09 (11:12a)	Naphthalene	18.6	6.13
	stripper inlet		Styrene	< QL	1.21
NE-25374	Surpper milet	1160	Toluene	11.9	1.19
			<i>m</i> -&/or <i>p</i> -Xylene	3.45	2.40
			o-Xylene	< QL	1.21
			Benzene	76.2	7.25
			Ethylbenzene	< QL	4.70
02A	Coke oven drip	4/16/09 (11:25a)	Naphthalene	46.0	12.5
	leg to boiler	•	Styrene	< QL	4.85
NE-25375	leg to boller	1241	Toluene	10.1	7.17
			<i>m</i> -&/or <i>p</i> -Xylene	< QL	9.60
			o-Xylene	< QL	4.85
			Benzene	87.9	6.40
			Ethylbenzene	< QL	3.13
03A	Surge tank	4/16/09 (11:33a)	Naphthalene	112	11.0
	effluent		Styrene	3.51	3.23
NE-25376	Cirident	1221	Toluene	16.0	3.17
			<i>m</i> -&/or <i>p</i> -Xylene	< QL	6.40
			o-Xylene	< QL	3.23
			Benzene	4.12	1.20
			Ethylbenzene	< QL	1.18
04A		4/16/09 (11:45a)	Naphthalene	39.7	8.78
**************************************	BH moat		Styrene	< QL	1.21
NE-25377		1235	Toluene	< QL	1.19
			<i>m</i> -&/or <i>p</i> -Xylene	< QL	2.40
			o-Xylene	< QL	1.21

Case 1:10-cr-00219-WMS-HKS Document 219 Filed 09/16/13 Page 13-of 25 Exhibit 8

ENFORCEMENT CONFIDENTIAL

Table 4

VOLATILE ORGANICS IN AIR ANALYTICAL RESULTS Tonawanda Coke Corporation Tonawanda, New York

NEIC Station Number		Date Collected (time)			
NEIC Tag Number	NEIC Station Location	Canister Number	Compound	Concentration (ppbv²)	Quantitation Limit (ppbv)
05A NE-25378	Drip leg downstream of tar precipitator	4/16/09 (11:52a) 1155	Benzene Ethylbenzene Naphthalene Styrene Toluene m-&/or p-Xylene o-Xylene	13.2 < QL 49.4 1.73 6.15 < QL < QL	1.20 1.18 8.23 1.21 1.19 2.40 1.21
06A NE-25379	Tar decanter tar	4/16/09 (12:10p) 1167	Benzene ³ Ethylbenzene Naphthalene Styrene Toluene m-&/or p-Xylene o-Xylene	1,580 < QL < QL < QL 279 < QL < QL	480 235 826 243 238 480 243
10A NE-25380	Ammonia removal system sump	4/16/09 (12:38p) 00124	Benzene ³ Ethylbenzene Naphthalene Styrene Toluene m-&/or p-Xylene o-Xylene	3,410 < QL 1,100 85.2 463 87.1 < QL	480 23.5 125 24.3 23.8 48.0 24.3
11A NE-25383	Downcomer sump	4/16/09 (12:45p) 00120	Benzene Ethylbenzene Naphthalene Styrene Toluene m-&/or p-Xylene o-Xylene	1,240 < QL < QL < QL 144 < QL < QL	120 118 276 122 119 241 122
12A NE-25381	Tar precipitator sump	4/16/09 (12:55p) 00126	Benzene Ethylbenzene Naphthalene Styrene Toluene m-&/or p-Xylene o-Xylene	3,670 < QL < QL < QL 1,820 < QL < QL < QL	241 236 414 243 238 481 243
15A NE-25384	South end of exhauster #2	4/20/09 (11:14a) 1220	Benzene ³ Ethylbenzene Naphthalene ³ Styrene Toluene ³ m-&/or p-Xylene o-Xylene	157 < QL 88.4 < QL 33.8 < QL < QL	9.60 9.40 16.5 9.70 9.50 19.2 9.70

Table 4

VOLATILE ORGANICS IN AIR ANALYTICAL RESULTS Tonawanda Coke Corporation Tonawanda, New York

NEIC Station Number		Date Collected (time)			
NEIC Tag	NEIC Station	, ,		Concentration ¹	Quantitation Limit
Number	Location	Canister Number	Compound	(ppbv²)	(ppbv)
			Benzene	73.8	4.80
			Dichlorodifluoromethane ⁴	89.9	5.25
16A	North end of	4/20/09 (11:15a)	Ethylbenzene	< QL	4.70
IOM	exhauster shed	4/20/09 (11.134)	Naphthalene	47.0	8.25
NE-25385	between #2 and	1249	Styrene	< QL	4.85
111 23303	#3	1247	Toluene	15.8	4.75
			<i>m</i> -&/or <i>p</i> -Xylene	< QL	9.60
		·	o-Xylene	< QL	4.85
			Benzene	< QL	9.60
			Ethylbenzene	< QL	9.40
17A		4/20/09 (3:45p)	Naphthalene	18.5	16.5
	Lagoon outlet		Styrene	< QL	9.70
NE-25386		1161	Toluene	< QL	9.50
			<i>m</i> -&/or <i>p</i> -Xylene	< QL	19.2
			o-Xylene	< QL	9.70
			Benzene	< QL	1.20
			Ethylbenzene	< QL	1.18
		4/16/09 (5:10p)	Naphthalene	<. <u>Q</u> L	41.3
NE-25382	Background		Styrene	< QL	1.21
		1172	Toluene	< QL	1.19
			<i>m</i> -&/or <i>p</i> -Xylene	< QL	2.40
1-00-000			o-Xylene	< QL	1.21
			Benzene	< QL	1.20
			Ethylbenzene	< QL	1.18
		4/20/09 (5:05p)	Naphthalene	< QL	2.06
NE-25387	Blank		Styrene	< QL	1.21
		1239	Toluene	< QL	1.19
-	·		<i>m</i> -&/or <i>p</i> -Xylene	< QL	2.40
			o-Xylene	< QL	1.21

 $^{^{1}}$ < QL indicates that the compound was not detected at or above the quantitation limit indicated. Parts per billion by volume.

Value is an average of three subsamples from one canister (n=3).

⁴ Also known as Freon-12 or R-12.

APPENDIX A

CHAIN-OF-CUSTODY RECORD
(6 pages)

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015.02.101 GOVERNMENT EXHIBIT 1:10-cr-00219

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